



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

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Greenbelt, Maryland 20770  
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June 26, 2014

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Bledsoe Telephone Cooperative Corp.  
Study Area Code 290554**

Dear Ms. Dortch:

On behalf of Bledsoe Telephone Cooperative Corp. ("Bledsoe"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Bledsoe seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan and of outage reporting.<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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June 26, 2014

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Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Bledsoe Telephone Cooperative Corp.  
Study Area Code 290554  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Bledsoe Telephone Cooperative Corp. (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment are attachments to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) <sup>4</sup> and must also report outages, both of which are contained in attachments to the 2014 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.<sup>6</sup> The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>6</sup> See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSON TEL COOP
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Gregory L. Anderson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	glanderson@bledson.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) <input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) <input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<input type="text" value="290554tn510.pdf"/> (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<input type="text" value="290554tn610.pdf"/> (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<input type="text" value=""/> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSON TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledsoe.net
<110>	Has your company received its ETC certification from the FCC?	<input checked="" type="radio"/> (yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

290554tn112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.


- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

glanderson@bledsoe.net

-- See attached worksheet --

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

Gregory L. Anderson  
4234471230 ext.  
glanderson@bledsoe.net

	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

-- See attached worksheet



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

290554	BLED SO	2015	Gregor	423447	glandee
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-- See attached worksheet --

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

<b>(900) Tribal Lands Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledsoe.net

<910>	Tribal Land(s) on which ETC Serves	
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<920>	Tribal Government Engagement Obligation	
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Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLED SOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledsoe.net

☐

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLED SOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gl.anderson@bledsoe.net

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

✓

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

✓

<1222> Details on the number of minutes provided as part of the plan,

✓

<1223> Additional charges for toll calls, and rates for each such plan.

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledsoe.net

**CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.**

<b>Incremental Connect America Phase I reporting</b>	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}

<b>Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}</b>	
<2012>	2013 Frozen Support Certification
<2013>	2014 Frozen Support Certification
<2014>	2015 Frozen Support Certification
<2015>	2016 and future Frozen Support Certification

<b>Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}</b>	
<2016>	Certification Support Used to Build Broadband

<b>Connect America Phase II Reporting {47 CFR § 54.313(e)}</b>	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

(3000) Rate Of Return Carrier Additional Documentation  
Data Collection Form

<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gl.anderson@bledsoe.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div></div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div></div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div><input checked="" type="radio"/> (Yes/No)</div>
(3014)	If yes, does your company file the RUS annual report	<div><input checked="" type="radio"/> (Yes/No)</div>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div><input checked="" type="checkbox"/></div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input checked="" type="checkbox"/></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div><div>290554tn3017.pdf</div><div>Name of Attached Document Listing Required Information (Yes/No)</div><div><input checked="" type="radio"/> <input checked="" type="radio"/></div></div>
(3018)	If the response is no on line 3014, Is your company audited?	<div><input type="radio"/> (Yes/No)</div>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<div><input type="checkbox"/></div>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div><input type="checkbox"/></div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div><input type="checkbox"/></div>
(3024)	Underlying information subjected to an officer certification.	<div><input type="checkbox"/></div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3026)	Attach the worksheet listing required information	<div><div></div><div>Name of Attached Document Listing Required Information</div></div>

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSON TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledson.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	290554
<015> Study Area Name	BLEDSE TEL COOP
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035> Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	glAnderson@bledse.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	BLEDSE TEL COOP
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/25/2014
Printed name of Authorized Officer:	Greg Anderson
Title or position of Authorized Officer:	General Manager
Telephone number of Authorized Officer:	4234472121 ext.
Study Area Code of Reporting Carrier:	290554 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	BLEDSE TEL COOP
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/25/2014
Printed name of Authorized Agent or Employee of Agent:	Lans Chase
Title or position of Authorized Agent or Employee of Agent	Staff Director - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.1
Study Area Code of Reporting Carrier:	290554 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**BLEDSON TELEPHONE COOPERATIVE CORP. (SAC 290554)**

**ATTACHMENT - LINE 112**

**FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

**ATTACHMENT REDACTED IN ENTIRETY**

## (200) Service Outage Reporting (Voice)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSCOE TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glanderson@bledscoe.net
<220>		

[illegible]

**Bledsoe Telephone Cooperative Corporation**  
**Demonstration of Complying with Applicable Service Quality Standards and**  
**Consumer Protection Rules**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Bledsoe Telephone Cooperative Corporation (“Company”) is not governed by the Rules of the Tennessee Regulatory Authority for service quality standards and consumer protection rules. However, the Company in the interest of protecting its own customers has incorporated consumer protection procedures comparable to those required of ILEC’s in the State of Tennessee, allowing the Company to meet or exceed existing TRA rules. These procedures include, but are not limited to, the following: (1) publishing

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

the rates, terms, and conditions of service; (2) implementation of anti-slamming and consumer protection procedures; (3) modeling bill presentation to reflect the truth-in-billing requirements; and (4) CPNI, Red Flag Rules, and other applicable federal requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

**Bledsoe Telephone Cooperative Corporation**  
**Demonstration of Ability to Function in Emergency Situations for Voice and**  
**Broadband Services**

Bledsoe Telephone Cooperative Corporation (“Company”) hereby certifies that it is able to function in emergency situations as set forth in Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Company is not governed by the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2, 1220-4-2-.23 Emergency Operation. However, Company is in compliance with all Federal emergency situations rules, since the Company’s central offices have adequate provision for emergency power. In addition, these backup power provisions also enable Company to meet or exceed existing TRA rules for emergency operations. Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Company has

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.



REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	290554
<015>	Study Area Name	BLEDSE TEL COOP
<020>	Program Year	2015
<030>	Contract Name - Person USAC should contact regarding this data	Gregory L. Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4234471230 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	glAnderson@bledsoe.net

	Residential Local Service Charge Effective Date	1/1/2014
<701>	Single State-wide Residential Local Service Charge	
<702>		

[illegible]

REDACTED FOR PUBLIC INSPECTION

[illegible]

	ORIGINAL SHEET NO. 51 GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE
	BLEDSONE TELEPHONE COOPERATIVE PIKEVILLE, TENNESSEE

**LOCAL EXCHANGE SERVICE****3.0 Service Connection Charges****3.11 Lifeline Assistance Program****3.11.1 General**

Lifeline Assistance is a retail service offering available to qualifying low-income subscribers, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for the following package of services: voice-grade access to the public switched network; local usage; dual- tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation.

**3.11.2 Application and Regulations**

- (A) Unless other eligibility requirements are established by the Commission, Lifeline Assistance is available to all subscribers who participate in one of the following programs: Medicaid; food stamps; Supplemental Security Income; Federal public housing assistance; or Low-Income Home Energy Assistance Program.
- (B) Each subscriber to Lifeline Assistance must certify in writing to the Cooperative, under penalty of perjury, that s/he receives benefits under a program outlined in subparagraph (A), above, and must, on that same document, agree to notify the Cooperative if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Cooperative shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service Administrators.
- (C) A subscriber to Lifeline Assistance may not be a dependent for Federal income tax purposes unless s/he is more than 60 years old.
- (D) A Subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.

ISSUED: JULY 30, 2009  
 ISSUED BY: BLEDSONE TELEPHONE COOPERATIVE  
 By: Greg Anderson

EFFECTIVE: SEPTEMBER 1, 2009  
 TITLE : General Manager

	ORIGINAL SHEET NO. 52 GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE
	BLED SOE TELEPHONE COOPERATIVE PIKEVILLE, TENNESSEE

**LOCAL EXCHANGE SERVICE****3.0 Service Connection Charges****3.12 Lifeline Assistance Program (Cont'd)****3.11.2 Application and Regulations (Cont'd)**

- (E) Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Cooperative first demonstrates to the Commission that the Cooperative would incur substantial costs that the Cooperative offers toll limitation without charges, and that telephone subscribership among low-income subscribers in the Cooperative's service area is greater than or equal to the national subscribership rate for low income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in the state for which the Company seeks the waiver. The Cooperative shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Cooperative may reapply for a waiver as necessary.
- (F) The Cooperative may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Cooperative, where available. If toll blocking is unavailable, then the Cooperative may charge a service deposit.

**3.11.3 Rate Regulations**

- (A) Lifeline Assistance provides a Federal baseline reduction in an amount equal to the NECA tariff rate for primary residential monthly End User Common Line charge. If the Commission approves an additional reduction of \$1.75 in the amount paid by a subscriber, then additional Federal Lifeline Assistance support in the amount of \$1.75 will be made available to the Cooperative providing Lifeline Assistance to that subscriber. The amount of Lifeline Assistance support shall not exceed the total of the federal End-User Common Line Charge and applicable local service rate charged to the Lifeline Assistance customer.
- (B) The Cooperative shall apply the baseline payments received by the administrator of the federal Lifeline Assistance program to waive the qualifying customer's federal End-User Common Line Charge. The Company shall apply any additional federal support amount to the qualifying customer's basic local exchange service rate.

ISSUED: JULY 30, 2009  
 ISSUED BY: BLED SOE TELEPHONE COOPERATIVE  
 By: Greg Anderson

EFFECTIVE: SEPTEMBER 1, 2009  
 TITLE : General Manager

	ORIGINAL SHEET NO. 53 GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE
	BLED SOE TELEPHONE COOPERATIVE PIKEVILLE, TENNESSEE

**LOCAL EXCHANGE SERVICE****3.0 Service Connection Charges****3.12 Lifeline Assistance Program****3.11.3 Rate Regulations (Cont'd)**

- (C) To be eligible for Lifeline Assistance, qualifying customers must subscribe to the lowest priced, flat-rated basic local exchange service offering that is made available in the Cooperative's service area.
- (D) Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

ISSUED: JULY 30, 2009  
ISSUED BY: BLED SOE TELEPHONE COOPERATIVE  
By: Greg Anderson

EFFECTIVE: SEPTEMBER 1, 2009  
TITLE : General Manager



**ORIGINAL SHEET NO. 55**  
**GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE**

**BLED SOE TELEPHONE COOPERATIVE**  
**PIKEVILLE, TENNESSEE**

### **LOCAL EXCHANGE SERVICE**

#### **5.0 Local Exchange Service**

##### **5.1 General Description**

- (A) Local Exchange Service provides for an access line and the ability to switch or complete a call made by one subscriber within the Telephone Cooperative Exchange to another subscriber within the Telephone Cooperative Exchange.
- (B) The provision of Local Exchange Service is also subject to the Rates, Charges, Rules and Regulations in all other section of this Tariff, which as they now exist or as they may be revised, added to, or supplemented by superseding issues, are hereby a part of the Local Exchange Service Section.

(C) Exchange Listings:

Originating Exchange Name

EAS Calling Points

College Station

Dunlap, Fall Creek Falls, Nine Mile, Pikeville,  
Chattanooga and parts of Hamilton County.

Dunlap

College Station, Fall Creek Falls, Nine Mile, Pikeville,  
Chattanooga, and parts of Hamilton County.

Fall Creek Falls

College Station, Dunlap, Nine Mile, Pikeville,  
Chattanooga, and parts of Hamilton County.

Nine Mile

College Station, Dunlap, Fall Creek Falls, Pikeville,  
Chattanooga, and parts of Hamilton County.

Pikeville

College Station, Dunlap, Fall Creek Falls, Nine Mile,  
Chattanooga, and parts of Hamilton County.

- (D) The following classes of service are offered in all Bledsoe Telephone Cooperative exchanges:

**FLAT RATE SERVICE – Access Line Service Only. Does not Include Terminal Equipment or Inside Wiring.**

- Residence 1-Party
- Business 1-Party
- Key Line
- PABX Trunk
- DID Trunk

## ORIGINAL SHEET NO. 56

## GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE

BLED SOE TELEPHONE COOPERATIVE  
PIKEVILLE, TENNESSEE**LOCAL EXCHANGE SERVICE****5.0 Local Exchange Service****5.2 Undertaking of the Telephone Cooperative**

- (A) The Telephone Cooperative will provide Local Exchange Service to subscribers residing within the exchange boundaries of the Telephone Cooperative Exchange.
- (B) Use of Local Exchange Service will be provided to residential and business subscribers only.
- (C) A subscriber that is provided with Local Exchange Service will be provided with a telephone number which numerical values are of the Telephone Cooperative's choosing.
- (D) A subscriber that is provided with a telephone number will also be provided with a one line entry in the annual telephone directory listing the subscriber's name, and telephone number. The subscriber's street address may be published at the option of the Telephone Cooperative. Unpublished numbers, unlisted numbers, additional listings or any variation of the Telephone Cooperative's directory listing may be made in accordance with the rates, rules and regulations set forth in Section 8, Directory Listings.
- (E) A subscriber that is provided Local Exchange Service may at the subscriber's request be provided Premise Extension Service in accordance with the provisions set forth in Section 10, Extension Service.
- (F) The Telephone Cooperative will administer its network to insure the provision of acceptable service levels to all subscribers of the Telephone Cooperative's service as defined in Part 64 of the FCC Rules. Generally, service levels are considered acceptable only when subscribers are able to establish connections with little or no delay encountered within the Telephone Cooperative network. The Telephone Cooperative maintains the right to apply protective controls which selectively cancels with completion of traffic carried over its network, including that associated with the subscriber's Local Exchange Service. Generally, such protective measures would only be taken as a result of occurrences such as failure or overload of Telephone Cooperative facilities, natural disasters, mass calling or national security demands. In the event that the protective controls applied by the Telephone Cooperative result in the complete loss of service by the subscriber, the subscriber will be granted a Credit Allowance for Service Interruption as set forth in Section 2.4.5 preceding.
- (G) Touch Tone Service is included with Local Exchange Service.
- (H) Service is classified as business service and business rates apply where the use is primarily or substantially of a business, professional, institutional, or otherwise occupational nature, or where the service or any part thereof is furnished at a business location.
- (I) Service is classified as residence service and residence rates apply where the use is primarily or substantially of a social or domestic nature and the business use, if any, is incidental.

## ORIGINAL SHEET NO. 57

## GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE

BLED SOE TELEPHONE COOPERATIVE  
PIKEVILLE, TENNESSEE**LOCAL EXCHANGE SERVICE****5.0 Local Exchange Service****5.2 Undertaking of the Telephone Cooperative**

- (J) Business Trunk rates apply to central office lines terminated in private branch exchange switching equipment, automatic call distributors or a common group of pooled lines connected to customer premises equipment.
- (K) Key Line rates apply to central office lines terminating in Key Telephone Equipment Systems.
- (L) Direct Inward Dial Trunk (DID) rates apply to central office lines arranged to allow only inbound calls to a specific station number in a Centrex or PABX trunk group which allows for call pick up without the call first being answered by an attendant.

**5.3 Limitations**

- (A) The Cooperative will assist the subscriber in finding an acceptable number, however, the determination of the numerical value of the telephone number provided to the subscriber is the sole responsibility of the Telephone Cooperative, and the telephone number itself is the sole property of the Telephone Cooperative.
- (B) The design of the local telephone directory and the individual listing of each subscriber is the sole responsibility of the Telephone Cooperative.
- (C) Local Exchange Service will not be provided to subscribers residing outside of the Telephone Cooperative's Local Exchange Area; however, Foreign Exchange Service may be offered by the Telephone Cooperative at its discretion.
- (D) Local Exchange Service will not be provided for use as dedicated facilities.
- (E) The Link-Up Service Connection Program will only be provided to residential subscribers at the principal residence of the eligible subscriber.

**5.4 Obligations of the End User**

The obligation of the subscriber are as set forth in Section 2.3 preceding. In addition, the following obligations apply:

- (A) The subscriber shall, upon application for Local Exchange Service, be provided the desired name for the directory listing and street address (optional) if different than that on the service order application.



**ORIGINAL SHEET NO. 58**  
**GENERAL SUBSCRIBER SERVICES TARIFF FOR THE STATE OF TENNESSEE**

**BLED SOE TELEPHONE COOPERATIVE**  
**PIKEVILLE, TENNESSEE**

**LOCAL EXCHANGE SERVICE**

**5.0 Local Exchange Service**

**5.4 Obligation of the End-User**

(B) A subscriber ordering an unlisted or unpublished directory listing shall notify the Telephone Cooperative of such order at the time of application for Local Exchange Service and order such service from Section 8, Directory Listings.

**5.5 Payment Arrangements and Credit Allowances**

The payment arrangements and credit allowances as set forth in Section 2.4 preceding apply.

**5.6 Rate Regulation**

(A) Residence

<u>Basic Monthly Exchange Rate*</u>	<u>Res. 1-Party</u>	<u>Bill Code</u>	<u>Bus. 1-Party</u>	<u>Bill Code</u>	<u>PABX** Trunk</u>	<u>Bill Code</u>	<u>Key Line</u>	<u>Bill Code</u>
College Station	\$11.70		\$19.45		\$32.95		\$19.45	
Dunlap	\$11.70		\$19.45		\$32.95		\$19.45	
Fall Creek Falls	\$11.70		\$19.45		\$32.95		\$19.45	
Nine Mile	\$11.70		\$19.45		\$32.95		\$19.45	
Pikeville	\$11.70		\$19.45		\$32.95		\$19.45	

\*Access Line only. Does not include Terminal Equipment.

\*\*Includes Trunk Hunting

**REDACTED – FOR PUBLIC INSPECTION**

**BLEDSON TELEPHONE COOPERATIVE CORP. (SAC 290554)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**